

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

PETER J. LYNCH,
Plaintiff,

v.

KATHRYN ANNE DONNELLY, in
her official capacity as Virgin Islands
Special Designated Disciplinary
Counsel, and in her Individual
Capacity, and
TANISHA BAILEY-ROKA, in her
Official capacity as Virgin Islands
Chief Disciplinary Counsel, and in
her Individual Capacity,
Defendants. _____/

3:24-cv-00043

Complaint for:
Injunctive Relief and
Damages

**PLAINTIFF'S OPPOSITION TO DEFENDANTS' JOINT MOTION
TO DISMISS THE FIRST AMENDED VERIFIED COMPLAINT**

COMES NOW the Plaintiff, Peter James Lynch, Esq., *pro se*, and files his Opposition to the Defendants' Joint Motion to Dismiss the First Amended Verified Complaint [ECF 37] (the "joint motion"), and says:

Defendants failed to confer prior to filing their Joint Motion to Dismiss [ECF 37], in violation of this Court's policies, and the motion could be stricken purely on that basis.

Defendants also failed to make themselves available to confer subsequent to filing their Joint Motion to Dismiss, and as a result the Appendix submitted herewith is the sole product of Plaintiff.

For the reasons articulated in Plaintiff's Memorandum in Support of his Opposition to Defendants' Joint Motion to Dismiss, filed herewith, Plaintiff maintains that this Court has ample justification to Deny Defendants' Joint Motion to Dismiss the First Amended Verified Complaint [ECF 37].

WHEREFORE Plaintiff Peter J. Lynch, Esq., *pro se*, respectfully requests that this Honorable Court Deny the Defendants' Motion to Dismiss.

Lynch v. Donnelly et al., 3:24-cv-43, Plaintiff's Opposition to Defendants' Joint Motion to Dismiss

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Respectfully,

s/ Peter J. Lynch

Peter J. Lynch, Esq., *pro se*

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Certificate of Service

I hereby certify, under penalties of perjury, that on this 29th day of October, 2024, I filed the foregoing via the District Court of the Virgin Islands' DC/ECF electronic filing system, which serves a copy electronically on the below-listed counsel of record:

Paul Gimenez, Esq.

Marc Tepper, Esq.

Andrew Simpson, Esq.

s/ Peter J. Lynch